

March 25, 2013

Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights MD 20743

FCC Proceeding 12-375

Dear Commissioners,

Over the course of five years of running two visiting programs for immigrant detainees in jails in New Jersey, I have seen firsthand the human cost of high phone rates and commissions on detainees and their families. Over the last few years, immigration detention capacity has increased dramatically in New Jersey to an all time high of approximately 2,250 beds.

Many of the detainees we visit remark on the financial difficulty that results from rates that can be as high as \$15 for a fifteen minute call to New York. Others tell us that they choose not to make calls, so as not to go into debt. Aside from the usual reasons that any inmate would need to be able to reach family members and the community at large while incarcerated, immigrant detainees are an especially vulnerable population, since they have no guaranteed right to an attorney, so as many as 84% represent themselves in immigration proceedings. They, therefore, need to be able to call relatives and agencies to pull together the necessary documents to represent themselves at their deportation hearings.

Essex County, New Jersey took in nearly \$1 million dollars last year in commissions alone, from calls made from the county jail, on top of a contract with Immigration and Customs Enforcement (ICE) for housing up to 800 detainees that provided the county with \$46 million in the last fiscal year. Monmouth County, New Jersey made over \$400,000 last year in commissions, and their contract with ICE brought in over \$9 million last year. It is immoral for the counties to balance their budgets by charging those who can least afford it. Maintaining contact with family while incarcerated can only ease re-entry.

Global Tel\*Link took in \$700,000 in Essex County last year and nearly \$400,000 in Monmouth County for providing phone service in the jails. We estimate that they could provide the service for one tenth of what they are charging based on the New York rate of 5 cents per minute. They provide the same service in Rhode Island for reasonable rates. It is in the public interest to stop phone companies from receiving excessive profits for providing phone service in United States jails and prisons.

We urge you to use your authority to bring interstate calls into line with states like New York that charge 5 cents per minute and to outlaw commissions for the states and counties. Thank you for your consideration.

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